

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE NEURONTIN MARKETING AND SALES PRACTICES LITIGATION	)	MDL Docket No. 1629
<hr/>		Master File No. 04-10981
THIS DOCUMENT RELATES TO:	)	
ALL ACTIONS	)	Judge Patti B. Saris
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**CLASS PLAINTIFFS' UNOPPOSED MOTION FOR ENLARGEMENT  
OF TIME TO FILE OPPOSITION TO MOTION TO DISMISS**

The Plaintiffs in the above-reference matter, by the undersigned counsel, respectfully move for an enlargement of the time within which they must submit an opposition to Defendants' Motion to Dismiss from Friday, April 15, 2005 until Friday, April 29, 2005. In support thereof, Plaintiffs state that the issues raised by Defendants' Motion to Dismiss are complex, and the response thereto requires the integration of work-product from a number of different law firms. Additional time is needed in order to ensure the Court is presented with a thorough and non-repetitive treatment of each of the issues raised by the Motion.

In addition, a number of Plaintiffs' counsel responsible for preparation of the opposition brief are participating in the final class action settlement approval hearing in *In Re: Lupron Marketing and Sales Practices Litigation*, MDL No. 1430, D. Mass. Master File No. 01-CV-10861-RGS, which begins today, April 13, 2005, and is anticipated to last for two days. Plaintiffs have consulted with counsel for Defendants who do not oppose the requested extension of time to allow an additional two weeks for Plaintiffs' Opposition.

WHEREFORE, the parties respectfully request that the Court enlarge to Friday, April 29, 2005, the period within which class Plaintiffs must submit an opposition to Defendants' Motion to Dismiss, and adjust the following additional related dates as follows:

<b>Event</b>	<b>Current Date</b>	<b>Proposed New Date</b>
Filing of Replies to Oppositions to Motion to Dismiss	May 2, 2005	May 16, 2005
Filing of Surreplies (if any)	May 16, 2005	May 30, 2005
Service of Initial Disclosures. Depositions (class/liability) begin	May 17, 2005	May 31, 2005
Hearing on Motion to Dismiss	June 1, 2005	June 15, 2005 (or as soon thereafter as maybe convenient for the Court)

Finally, on March 16, 2005, the Court granted Defendants' unopposed motion for leave to file a single 40-page brief in support of their Motion to Dismiss, in lieu of two 20-page briefs. Plaintiffs respectfully request that they be permitted to do the same.

Dated: April 13, 2005

Respectfully Submitted,

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*Members of the Plaintiffs' Non-Class  
Steering Committee*

**CERTIFICATION PURSUANT TO L.R. 7.1**

The undersigned, counsel for Class Plaintiffs in the above-reference matter, hereby certifies that on April 12-13, 2005 he conferred with counsel for Defendants, by voicemail and email, concerning the foregoing motion and Defendants have no objection or opposition to the requested relief.

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